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Cc: Ray.Dan@PARKS
Subject: 4th Draft Delta Plan comments
Date: Monday, June 27, 2011 10:06:37 AM
Attachments: [Comments on Fourth Draft Delta Plan3.docx](#)

Thank you for the opportunity to review and comment on the Fourth Staff Draft Delta Plan. Restoring the Delta's and Suisun Marsh's ecosystem and improving the reliability of Delta's water supply can aid recreation, both within the region and at reservoirs south of the Delta. Many of the plan's proposals can enhance these values, providing improved conditions for angling, wildlife observation, and water contact that provide so much of the water-related recreation within the region.

We are concerned, nevertheless, about the plan's ability to achieve the objective of protecting and enhancing the unique cultural and recreational values of the Delta and Suisun Marsh, which the Delta Reform Act recognizes is inherent in its goals of providing a more reliable water supply and restoring the Delta ecosystem. In the comments attached, we recommend several new policies to protect and enhance the Delta's and Suisun Marsh's recreational opportunities and cultural assets.

Our comments are attached. Please feel free to contact Dan Ray or me if you would like to discuss them further or if we can provide additional information.

Best regards,

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"Watersheds come in families; nested levels of intimacy... As you work upstream toward home, you're more closely related. The big river is like your nation, a little out of hand. The lake is your cousin. The creek is your sister. The pond is her child. And, for better or worse, in sickness and in health, you're married to your sink. " Michael Parfit, National Geographic

California State Parks Comments on Fourth Staff Draft Delta Plan 6/27/11

Daniel Ray – Chief, Planning Division

- Page 14 line 5 replace “Delta Recreation Plan” with: ***Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh***. Cite web location of plan in footnote 5 as www.parks.ca.gov/deltarecreation.
- Page 83 after line 26 Add item:
- ◆ ***Extensive recreational access and environmental education that help Californians understand, enjoy, appreciate and support a healthy Delta ecosystem.***
- (to more explicitly support Water Code section 85054 and include the concept stated on page 86 line 30)
- Page 98 line 23 Administrative Performance measures. Add: ecosystem restoration, ***public access and environmental education***.
- Page 119 line 34 WQ R6 add: ***Fish advisories and other current information about water quality conditions that can affect public health should be made easily available to recreationists to help them protect their health.***
- Page 141 table 7-1 Clarify the term “infrastructure”. Water-associated recreational infrastructure, as well as rural roads serving recreation areas and farmlands, are often placed in areas subject to flooding by necessity. Alternative locations are frequently unavailable.
- Page 155 Introduction: Discuss and apply the concept of “the Delta as an evolving place.” What does that mean in the context of the protection, preservation and maintenance language in the legislation? Core values or characteristics that should be preserved or protected as the region evolves should be clear. Values and characteristics important to recreation, for example, include the quiet rural character of much of the region, extensive waterways served by docks and marinas, the cultural heritage embodied in legacy communities and century farmsteads, remnants of the natural setting and wildlife, and historic marine/transportation/water infrastructure. Views of the Sacramento and San Joaquin Rivers, other waterways, and the diverse agricultural landscape from Route 160, a state scenic highway, as well as Routes 4 and 12, often backed by Mount Diablo or the Montezuma Hills, also contribute to the Delta’s sense of place.
- Methodologies for this type of analysis are available. For instance, State Park’s Planning Handbook describes a park-centric strategy, “Sense of Place. The unit’s

character and sense of place should be described in terms of its enduring values. Identify which attributes and qualities make this a place of inspiration, recreation, and renewal. Describe, if possible, the inherent forces and connections that attract those who visit this unit.” The National Park Service’s Historic Landscape Initiative gives more detailed methodology and is available at: <http://www.cr.nps.gov/hps/hli/>.

Page 160 line 7+

Recreation should be recognized in its own right as a value contributing to the Delta as an evolving place, consistent with the emphasis of Public Resources Code 29702, rather than subsumed under other values of natural, cultural, and agricultural heritage. The region’s recreation opportunities arise not just because of its heritage values as the current text implies, but also because of its location, its waters and fish and wildlife resources, and the lifestyle and recreational preferences of residents and visitors. For instance, 7.4 million annual visitor boating days occurred in the Delta and Suisun Marsh in 2010. This section now entitled “Natural, Agricultural, and Cultural Heritage” should be retitled and its text revised to give proper emphasis to recreation as a valued attribute in its own right, related to but not subsumed in the region’s natural, agricultural and cultural heritage. We appreciate the recognition of our Gateway-Basecamp-Adventure strategy, but would remind the DSC that its importance is in its strategy, rather than its list of communities exemplifying various elements of the strategy.

Page 161 line 8

The Plan should propose Policies consistent with Public Resources Code 29702’s admonition to “protect, maintain, and where possible enhance and restore the Delta environment, including ... recreation” Two policies are especially important:

- ◆ ***Water management facilities and ecosystem restoration activities shall be designed, constructed, and operated to meet recreational needs and shall provide for full utilization of these projects for recreational purposes to the extent that those features are consistent with other uses of the project, if any. California State Parks’ Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh shall be used as a guide in planning for recreation at these sites. Any improvements to meet recreation needs shall be ready and available for public use when each project having a potential for such use is completed.***

This or a similar policy would ensure that Bay-Delta improvements will provide public recreation that approaches the provisions of the Davis-Dolwig Act which has governed the improvement of recreation at the State Water Project. As the State Water Project is modernized to meet today’s water supply reliability and ecosystem restoration needs, the commitment to public recreation won in prior generations should be extended to current Californians.

A second important policy would ensure adequate mitigation of adverse effects to recreation:

- ◆ ***Existing outdoor recreation uses shall be protected where feasible, and adverse effects to outdoor recreation shall be mitigated. California State Parks' Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh shall be used as a guide in selecting mitigation measures.***

This or a similar policy would protect and maintain recreation consistent with Public Resources Code 29702(b).

Another policy that would provide a critical basis for documenting and evaluating the “unique cultural, recreational, natural resources and agricultural values” of the Delta’s landscape would include:

- ◆ ***The Delta Stewardship Council shall complete a Cultural Landscape Report of the Delta, consistent with the National Park Service’s Historic Landscape Initiative, within the next five years.***

Page 161 map	While we appreciate the effort, mapping all “Delta resources and recreation” will require much more extensive research (and a larger map). For instance, there are almost 100 marinas, more than 150 duck clubs, numerous historic buildings and bridges and many more fishing access points not shown. Hwy 160, a state scenic highway, should be shown. The definition of a “Land Facility” is unclear. Bicycles are allowed on most public roads and often prefer off-highway travel. The California Recreational Trails System routes and other significant local trail systems should be shown, as well as the scenic highway.
Page 162 line 6	In the sentence: “Public access and facilities must be improved as visitation increases” –replace “visitation” with <i>the regional population and tourism trends.</i>
Page 162 line 11	We do not believe the Suisun Marsh is currently part of the NHA proposal the DPC has prepared.
Page 163 line 7	Performance Measures. Add: ◆ <i>Robust collaboration among local, state, federal agencies, business and non-profit organizations to increase and enhance recreational opportunities is evident by 2020.</i>
page 168 line 25	add: major Delta Plan activities (<i>...protection and enhancement of the region’s values...</i>)
page 172 line 11+	FP R1. Water-associated recreational infrastructure is, by necessity, often placed in areas subject to flooding. Recreation facilities should, where feasible, be

designed and/or located where they will not be destroyed by flooding or other natural physical processes, where they will not alter natural processes, and where risks of damage can be mitigated through floodproofing and other appropriate measures.

page 173 line 14

FP R6. Additional fees should not be assessed against recreationists. Boat licensure fees and fuel taxes generated by recreational boating already provide appropriate contributions to the control of invasive species and to mitigate other recreation-associated stressors. Imposing additional costs on recreation would undermine efforts to create a more sustainable Delta economy by promoting recreation and tourism.

page 174 line 5

FP R11. Add to line 5: This fund could provide for ecosystem ***and recreational facilities acquisition, development and maintenance*** that were once paid with...